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PLEASE REPLY TO

CHATTANOOGA OFFICE

OF COUNSEL:
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J. GREGORY GRISHAM

August 5, 2009

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DALTON, GEORGIA 30722
(706) 270-0222
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F.I.N. 62-0520912

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NUMBER 7005 1820 0008 0453 7815

Mr. Michael W. Ingram
No. 135345 Davidson County Criminal
Justice Center
448 Second Avenue, North
Nashville, Tennessee 37201

RE: Michael W. Ingram v. Daron Hall, et. al., No.: 3:09-MC-00037
In the United States District Court for the Middle District of Tennessee

Dear Mr. Ingram:

We acknowledge receipt of your letter addressed to me dated July 26, 2009, as of August 4, 2009, in our Chattanooga office. We also acknowledge receipt of a copy of a Motion to File an Amended Complaint, Proposed Amended Complaint, First Set of Interrogatories and First Requests for Production of Documents.

You indicated you have received a Notice of Service for Discovery, but that you have not received our Interrogatories or Requests for Production addressed to you. We do not understand this, because we did serve it by Certified Mail and received a Track & Confirm from the United States Postal Service indicating that the envelope from us to you was delivered at 5:12 a.m. on July 9.



In any event, we are re-serving our Interrogatories and Requests for Production at this time, and a copy of those documents is enclosed herewith.

Your proposed Amended Complaint includes the following new names:

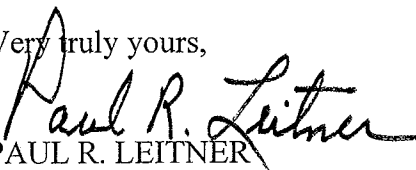
- * "Allen Bradley Lloyd Management, Inc." is unknown to our client. The correct name of the party contracting with Davidson County is "ABL Management, Incorporated"
- * "ABL Food Service" – ABL Management, Inc. does not use that name.
- * "Vicki Jenkins" – We assume this is Vickie Jenkins, current employee.
- * "REytchison" – We assume this is Richard Eytchison, previous employee.
- * "Danna Akins" – We assume this is Dana Akins, current employee.
- * "Bakette L." – We assume this is Babette Lanius, current employee.
- * "Ms. Lon Kid"- This is a name not known to ABL Management, Inc.

Total enclosures are as follows:

1. Letter of Attorney Paul Brewer of July 7 to you;
2. Track & Confirm Search Results from the United States Postal Service;
3. First Set of Interrogatories of ABL Management, Inc.; V. Dulin and V. Jenkins;
4. First Requests for Production.

The Rules require that you answer the Interrogatories under oath and respond to the Requests for Production within thirty-three (33) days from August 5.

Very truly yours,


PAUL R. LEITNER
For the Firm

PRl:sln

Enclosures: As noted above

cc: J. Paul Brewer, Esq. (w/enclosures)

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801 BROAD STREET • THIRD FLOOR
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Attor: RL

1005-1820 0008 0453 7815

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Michael J. Williams
No 135345 Davidson
County Courthouse North
448 Second Avenue, North
Nashville TN 37201

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ X *[Signature]* ☐ Agent

B. Received by (Printed Name) ☐ Addressee

C. Date of Delivery *8/19*

D. Is delivery address different from item 1? ☐ Yes ☐ No

3. Service Type

- ☐ Certified Mail ☐ Express Mail
- ☐ Registered ☐ Return Receipt for Merchandise
- ☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7005 1820 0008 0453 7815

PS Form 3811, February 2004

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Street, Apt. No., or PO Box No. *448 and Ave N*
City, State, ZIP+4 *Nashville TN 37201*

PS Form 3800, June 2002

See Reverse for Instructions